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11 United States of America

12  
13 IN THE UNITED STATES DISTRICT COURT  
14 EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,  
16 Plaintiff,  
17 v.  
18 VICTOR ROMERO GALVAN,  
19 Defendant.

20 CASE NO. 1:20-CR-00161-JLT-SKO  
21 STIPULATION AND ORDER TO VACATE  
22 STATUS CONFERENCE AND SET CHANGE OF  
23 PLEA HEARING

24  
25 **STIPULATION**

26 Plaintiff United States of America, by and through its counsel of record, and defendant VICTOR  
27 ROMERO GALVAN, by and through defendant's counsel of record, Daniel Harralson, and hereby  
28 stipulate as follows:

1. By previous order, this matter was set for status on March 5, 2025.

2. By this stipulation, the parties now move to vacate the status conference and set a change  
of plea hearing for March 10, 2025, and to exclude time between March 5, 2025, and March 10, 2025,  
under Local Codes T2 and T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case  
includes over 14,000 pages of Bates stamped discovery and numerous wiretap recordings. The  
majority of the discovery has been either produced directly to counsel and/or made available for

1 inspection and copying. Supplemental discovery has also been produced.

2 b) There was a change in counsel and defendant Galvan has new counsel as of July  
3 2024.

4 c) Counsel for defendant desires additional time to consult with his client, to prepare  
5 for the change of plea hearing, and prepare for sentencing.

6 d) Counsel for defendant believes that failure to grant the above-requested  
7 continuance would deny him the reasonable time necessary for effective preparation, taking into  
8 account the exercise of due diligence.

9 e) Based on the above-stated findings, the ends of justice served by continuing the  
10 case as requested outweigh the interest of the public and the defendant in a trial within the  
11 original date prescribed by the Speedy Trial Act.

12 4. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq.,  
13 within which trial must commence, the time period of March 5, 2025 to March 10, 2025, inclusive, is  
14 deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] and 18 U.S.C. §  
15 3161(h)(7)(A), B(ii) [Local Code T2], because it results from a continuance granted by the Court at  
16 defendant's request on the basis of the Court's finding that the ends of justice served by taking such  
17 action outweigh the best interest of the public and the defendant in a speedy trial.

18 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
19 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
20 must commence.

21 IT IS SO STIPULATED.

22 Dated: February 10, 2025

23 MICHELE BECKWITH  
Acting United States Attorney

24 \_\_\_\_\_  
25 /s/ ANTONIO J. PATACA  
ANTONIO J. PATACA  
26 Assistant United States Attorney  
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28

1 Dated: February 10, 2025

/s/ DANIEL HARRALSON

2 DANIEL HARRALSON

3 Counsel for Defendant

4 VICTOR ROMERO GALVAN

5

6

7 **ORDER**

8 IT IS SO ORDERED.

9

10 Dated: 2/10/2025

11 *Sheila K. Oberto*

12 THE HONORABLE SHEILA K. OBERTO

13 UNITED STATES MAGISTRATE JUDGE